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UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

This Document Relates to:  
  
ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER  
REGARDING EXPEDITED BRIEFING  
SCHEDULE FOR PLAINTIFFS' NOTICE  
OF MOTION AND MOTION TO ENFORCE  
PTO NO. 2 AND TO COMPEL DEFENDANTS  
TO PRODUCE LITIGATION HOLD AND  
PRESERVATION INFORMATION**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

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15 *Co-Lead Counsel for Plaintiffs*

**STIPULATION**

**WHEREAS**, on December 14, 2023, Plaintiffs filed their Motion to Enforce PTO No. 2 and to compel Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively “Uber”) to produce litigation hold and preservation information (the “Motion”); and

**WHEREAS**, the parties have met and conferred about the issues in dispute in Plaintiffs’ Motion and an expedited briefing schedule for said Motion; and

**WHEREAS**, the parties agreed to resolve Plaintiffs’ Motion on an expedited briefing schedule with Defendants’ Response to Plaintiffs’ Motion due on December 22, 2023 and Plaintiffs waiving the filing of a Reply to Defendants’ Response; and

**WHEREAS**, on December 15, 2023, Judge Cisneros ordered that Defendants’ Response to Plaintiffs’ Motion would be due on December 20, 2023 and the hearing would take place on December 22, 2023 at 10:30 a.m.; and

**WHEREAS**, the parties agree to adhere to their originally agreed upon schedule; and

**THEREFORE**, the parties respectfully request the Court enter the parties’ stipulation that:

- Defendants’ Response to Plaintiffs’ Motion shall be due on or before December 22, 2023;
- Plaintiffs shall not file a Reply to Defendants’ Response; and
- The December 22, 2023 hearing is adjourned and will be reset for a date and time deemed suitable by the Court.

**IT IS SO STIPULATED.**

Dated: December 15, 2023

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

By: /s/ Robert Atkins

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RASIER, LLC, and RASIER-CA, LLC

1 Dated: December 15, 2023

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18 *Co-Lead Counsel for Plaintiffs*

21 **FILER'S ATTESTATION**

22 I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this  
23 document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories  
24 identified above has concurred in this filing.

26 Dated: December 15, 2023

By: /s/ Robert Atkins

Robert Atkins

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7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION  
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11 IN RE: UBER TECHNOLOGIES, INC.,  
12 PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

13 This Document Relates to:

14 ALL ACTIONS  
15

**[PROPOSED] ORDER GRANTING  
STIPULATION TO HAVE AN EXPEDITED  
BRIEFING SCHEDULE FOR PLAINTIFFS'  
NOTICE OF MOTION AND MOTION TO  
ENFORCE PTO NO. 2 AND TO COMPEL  
DEFENDANTS TO PRODUCE LITIGATION  
HOLD AND PRESERVATION INFORMATION**

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17 The Court hereby GRANTS the parties' stipulation as follows:

- 18 • Defendants' Response to Plaintiffs' Motion to Enforce PTO No. 2 and to compel  
19 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively  
20 "Uber") to produce litigation hold and preservation information shall be due on or  
21 before December 22, 2023;
- 22 • Plaintiffs shall not file a Reply to Defendants' Response; and
- 23 • The December 22, 2023 hearing is adjourned and will be reset for a date and time  
24 deemed suitable by the Court.

25 **IT IS SO ORDERED.**  
26

27 Date: \_\_\_\_\_, 2023

\_\_\_\_\_  
HON. CHARLES R. BREYER  
UNITED STATES DISTRICT JUDGE  
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